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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**HAWKNET LTD.,**

**Plaintiff,**

**-against-**

**OVERSEAS SHIPPING AGENCIES;  
OVERSEAS WORLDWIDE HOLDING  
GROUP; HOMAY GENERAL TRADING  
CO. LLC; MAJDPOUR BROS CUSTOMS  
CLEARANCE, MAJDPOUR BROS  
INTERNATIONAL SEA & LAND  
TRANSPORT S.A.; GULF OVERSEAS  
LLC; GULF OVERSEAS GENERAL  
TRADING LLC and MOS OVERSEAS  
SHIPPING VERMITTLUNG GMBH.**

**Defendants.**

**DECLARATION OF  
WILLIAM ROBERT  
COOK IN  
OPPOSITION TO  
MOTION  
TO VACATE  
ATTACHMENT AND  
IN SUPPORT OF  
CROSS-MOTION  
TO AMEND**

UNITED KINGDOM )  
CITY OF LONDON )

I, WILLIAM ROBERT COOK, of Tuition House, 27 to 37 St George's Road, Wimbledon, London SW19, hereby declare and state as follows:

1. I am the Chartering Manager of Hawknet Ltd. I submit this declaration in opposition to non-party TOM Shipping Vermittlung GmbH's motion to vacate an attachment of funds at the Bank of New York Mellon on March 18, 2008 and in support of plaintiff Hawknet's cross-motion for leave to file a Second Amended Complaint adding TOM Shipping as a defendant.

2. As alleged in paragraph 25 of the Amended Complaint in this action, “all of the defendants are part of an Iranian business entity named Overseas Worldwide Holding Group” which “is controlled and dominated by the Majdpour Brothers, who include *inter alia* Tawfiq, Sina and Majid Majdpour.” All of the stock in defendant MOS Overseas Vermittlung GmbH (“MOS”) is owned by Tawfiq, Sina, Majid and Naser Jaffar Majdpour. In addition, Majid and Tawfiq Majdpour are the only directors of defendant MOS, which has its office and place of business at Neuer Wall 8, Hamburg D-20354, Germany. (These statements about MOS Overseas are confirmed by Exhibit 8 to Mr. Asadollah Rahimzadeh’s declaration in support of the motion to vacate.)

3. I first became aware of a connection between what I now know to be TOM Shipping and the Majdpour family in late February of this year. I was informed by a contact in Iran that the Majdpours had recently purchased two 4,000 dwt vessels, the TOM SHIP 1 and TOM SHIP 2, from the Islamic Republic of Iran Shipping Lines. I attempted to obtain more information about this transaction but was unsuccessful. However, I did not hear the name “TOM Shipping” until the attachment took place in this court action.

4. When the attachment occurred in this case, I learned from the wire transfer document provided by the Bank of New York Mellon that the money was apparently being sent to pay “freight charges” on the M/V JOUDI, a vessel which TOM Shipping claims it chartered on February 8, 2008 for a voyage from Selaata, Lebanon to Bandar Abbas, Iran. Upon inquiry with sources in the shipping industry, I determined that the JOUDI is managed by Bluefleet Marine, a company in Greece, and that the vessel had been operating on time charter to Brooklands Planning Pte. Ltd. of Singapore. On Monday April 7th, I asked a shipping broker in Greece to contact Bluefleet Marine to see what they knew about the company (allegedly TOM Shipping) that had sub-chartered the ship from Brooklands Planning. My contact

spoke to Mr. Roy Khoury, the man responsible for vessel chartering at Bluefleet. When Mr. Khoury was asked if he knew the identity of Brooklands Planning's sub-charterer, he replied "something like Overseas".

5. When the JOUDI was discharging at Bandar Abbas, at the end of the voyage from Selaata, I asked a shipping agent in Iran to find out who was looking after the vessel's agency and they learned from the port documents that defendant Overseas Shipping Agencies, one of the Majdpour companies and a defendant in this action, was handling the vessel's affairs in the port.

6. Exhibits annexed to Mr. Rahimzadeh's declaration in this action show that Mr. George Lemos of Sea Challenger Maritime Limited in London acted as the broker for TOM Shipping in chartering the M/V JOUDI for the voyage from Lebanon to Iran. Hawknet has encountered Mr. Lemos before. When the defendants defaulted in their obligations to Hawknet under the charter party dated June 15, 2005 (see paragraphs 11 - 17 of the Amended Complaint), another, less expensive vessel, the M/V KONKAR THEO, was chartered to carry what would have been the second cargo under defendants' contract with Hawknet. Mr. Lemos acted for defendants in connection with the chartering of the KONKAR THEO and it is generally known in London that he has acted as the charter party broker for the Majdpour companies.

  
WILLIAM R. COOK

**DECLARATION PURSUANT TO 28 U.S.C. § 1746**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and has been executed on this, the 9th day of April, 2008.

  
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WILLIAM R. COOK

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